IN THE

Supreme Court of the United States

OCTOBER TERM, 1967

No. 502

BROTHERHOOD OF RAILROAD TRAINMEN, *Petitioner*,

v.

CERTAIN CARRIERS REPRESENTED BY THE EASTERN, WESTERN & SOUTHEASTERN CARRIERS CONFERENCE COMMITTEES, THE TERMINAL RAILROAD ASSOCIATION OF ST. LOUIS, *Respondents*.

PETITIONER'S SUPPLEMENTAL BRIEF IN REPLY TO OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

On August 16, 1967, Petitioner filed its petition for a writ of certiorari in this case. On September 15, 1967, Respondent filed its Brief in opposition, in which it stated that the basic issue in this case, whether Board 282 continues to exist after the expiration of the statute that created it, is not important because "there are not likely to be many future disputes over the meaning and application of the award by Board 282". Page 11 of Opposition. On September 28, 1967 Petitioner filed a Reply to that Opposition.

On September 25, 1967 an action was filed in the United States District Court for the District of Columbia by one of the "certain carriers" in which it showed that hundreds of such disputes had arisen on one railroad system, the Kansas City Southern. That action is styled "The Kansas City Southern Railway Company, et al. v. Brotherhood of Railroad Trainmen, et al," Civil Action No. 2453-67. In that action they contend that Board 282 has exclusive jurisdiction to consider interpretations and applications of that Board's Award even to the exclusion of other tribunals to which the parties agreed to submit the disputes for final resolution.

Respectfully submitted,

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October, 1967